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JPMorgan Chase Bank, N.A.

SUPERB MOTORS INC., TEAM AUTO SALES LLC, ROBERT ANTHONY URRUTIA, 189 SUNRISE HWY AUTO LLC, NORTSHORE MOTOR LEASING, LLC, BRIAN CHABRIER, *individually and derivatively as a member of* NORTSHORE MOTOR LEASING, LLC, JOSHUA AARONSON, *individually and derivatively as a member of* 189 SUNRISE HWY AUTO, LLC, JORY BARON, 1581 HYLAN BLVD AUTO LLC, 1580 HYLAN BLVD AUTO LLC, 1591 HYLAN BLVD AUTO LLC, 1632 HYLAN BLVD AUTO LLC, 1239 HYLAN BLVD AUTO LLC, 2519 HYLAN BLVD AUTO LLC, 76 FISK STREET REALTY LLC, 446 ROUTE 23 AUTO LLC and ISLAND AUTO MANAGEMENT, LLC,

Plaintiffs,

v.

ANTHONY DEO, SARAH DEO, HARRY THOMASSON, DWIGHT BLANKENSHIP, MARC MERCKLING, MICHAEL LAURIE, THOMAS JONES, CPA, CAR BUYERS NYC INC., GOLD COAST CARS OF SYOSSET LLC, GOLD COAST CARS OF SUNRISE LLC, GOLD COAST MOTORS AUTOMOTIVE GROUP LLC, GOLD COAST MOTORS OF LIC LLC, GOLD COAST MOTORS OF ROSLYN LLC, GOLD COAST MOTORS OF SMITHTOWN LLC, UEA PREMIER MOTORS CORP., DLA CAPITAL PARTNERS INC., JONES, LITTLE & CO., CPA'S LLP, FLUSHING BANK, LIBERTAS FUNDING LLC, and J.P. MORGAN CHASE BANK, N.A.,

Defendants.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Case No.: 2:23-cv-6188 (OEM)(JMW)

**CERTIFICATION OF ANTHONY C.
VALENZIANO IN SUPPORT OF JPMORGAN
CHASE BANK, N.A.'S MOTION TO DISMISS**

I, ANTHONY C. VALENZIANO, do hereby certify as follows:

1. I am a partner with the law firm of Sherman Atlas Sylvester & Stamelman LLP, attorneys for defendant JPMorgan Chase Bank, N.A. (“Chase”). I am fully familiar with the facts set forth herein and submit this certification in support of Chase’s motion for an Order dismissing Counts One, Two, Forty-Seven and Forty-Eight of the First Amended Complaint of plaintiffs pursuant to Federal Rule of Civil Procedure 12(b)(6).

2. Attached hereto as **Exhibit A** is a true and complete copy of Plaintiffs’ First Amended Complaint (without exhibit) filed in this matter.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements by me are willfully false, I am subject to punishment.

/s/Anthony C. Valenziano
ANTHONY C. VALENZIANO

DATED: February 9, 2024